FILED CLERK, U.S. DISTRICT COURT 1 3/24/2023 2 CENTRAL DISTRICT OF CALIFORNIA DEPUTY 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE CENTRAL DISTRICT OF CALIFORNIA 10 January 2023 Grand Jury CR 2:23-cr-00142-ODW 11 UNITED STATES OF AMERICA, 12 Plaintiff, I N D I C T M E N T [18 U.S.C. § 2113(b): Bank 13 v. Larceny] 14 GENE CLARK VIZCONDE CONTRERAS, 15 Defendant. 16 17 The Grand Jury charges: COUNTS ONE THROUGH TWENTY-THREE 18 19 [18 U.S.C. § 2113(b)] 20 On or about the following dates, in the following counties, 21 within the Central District of California, defendant GENE CLARK 22 VIZCONDE CONTRERAS knowingly took and carried away, with the intent 23 to steal and purloin, money and things of value exceeding \$1,000, namely, cash in the following amounts, belonging to, and in the care, 24 25 custody, control, management, and possession of Bank of America, N.A., a bank the deposits of which were then insured by the Federal 26

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Deposit Insurance Corporation:

COUNT	DATE (S)	APPROXIMATE AMOUNT	LOCATION	COUNTY	ATM ID. NO.
ONE	November	\$3,860	1096 Coast	Santa	ICAH3787
	10, 2021		Village	Barbara	
			Road, Santa		
			Barbara,		
			California		
TWO	December	\$1,420	1096 Coast	Santa	ICAH3787
	10, 2021		Village	Barbara	
			Road, Santa		
			Barbara,		
	П-1	¢1 27F	California	0 + -	TONIO 707
THREE	February	\$1,375	1096 Coast	Santa Barbara	ICAH3787
	10, 2022		Village	Barbara	
			Road, Santa Barbara,		
			California		
FOUR	October	\$5,220	1855 North	Ventura	ICAH3219
FOOR	30, 2021	70,220	Oxnard	Vencura	ICAII3219
	30, 2021		Boulevard,		
			Oxnard,		
			California		
FIVE	January	\$14,810	1855 North	Ventura	ICAH3219
	5, 2022		Oxnard		
			Boulevard,		
			Oxnard,		
			California		
SIX	January	\$6,560	1855 North	Ventura	ICAH3219
	21, 2022		Oxnard		
			Boulevard,		
			Oxnard,		
			California		
SEVEN	February	\$4,949	1855 North	Ventura	ICAH3219
	14, 2022		Oxnard		
			Boulevard,		
			Oxnard,		
		à.c. 250	California		
EIGHT	December	\$6,350	1855 North	Ventura	ICAH4323
	12, 2021		Oxnard		
			Boulevard,		
			Oxnard, California		
NINE	Tanuaru	\$2,300	1855 North	Ventura	ICAH4323
TA T TAT:	January 22, 2022	72,300	Oxnard	Velicura	TCAR4323
	22, 2022		Boulevard,		
			Oxnard,		
			California		
			Carriornia		

COUNT	DATE (S)	APPROXIMATE AMOUNT	LOCATION	COUNTY	ATM ID.
TEN	January	\$9,400	1855 North	Ventura	ICAH5914
	21, 2022		Oxnard		
			Boulevard,		
			Oxnard,		
			California		
ELEVEN	January	\$4,956	755 West	Ventura	ICAH1078
	1, 2022		Channel		
			Islands		
			Boulevard,		
			Port		
			Hueneme,		
			California		
TWELVE	January	\$3,861	755 West	Ventura	ICAH1078
	11, 2022		Channel		
			Islands		
			Boulevard,		
			Port		
			Hueneme,		
			California		
THIRTEEN	December	\$9,030	755 West	Ventura	ICAH7782
	15, 2021		Channel		
			Islands		
			Boulevard,		
			Port		
			Hueneme,		
			California		
FOURTEEN	February	\$2,268	755 West	Ventura	ICAH7782
	2, 2022		Channel		
			Islands		
			Boulevard,		
			Port		
			Hueneme,		
		40.015	California		
FIFTEEN	February	\$2,015	755 West	Ventura	ICAH7782
	24, 2022		Channel		
			Islands		
			Boulevard,		
			Port		
			Hueneme,		
Q T 1/m = -1-	<u></u>	01 460	California	1	T 0 7 7 7 0 0 0 5
SIXTEEN	December	\$1,460	205 West	Ventura	ICAH2867
	11, 2021		Ojai Avenue,		
			Ojai,		
			California		

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COUNT	DATE (S)	APPROXIMATE AMOUNT	LOCATION	COUNTY	ATM ID. NO.
SEVENTEEN	January	\$2,937	205 West	Ventura	ICAH2867
	4, 2022		Ojai Avenue,		
			Ojai,		
			California		
EIGHTEEN	February	\$2,079	205 West	Ventura	ICAH5926
	6, 2022		Ojai Avenue,		
			Ojai,		
			California		
NINETEEN	February	\$2,196	2400 East	Ventura	ICAH2761
	24, 2022		Ponderosa		
			Drive,		
			Camarillo,		
			California		
TWENTY	October	\$4,250	2400 East	Ventura	ICAH7205
	29, 2021		Ponderosa		
			Drive,		
			Camarillo,		
			California		
TWENTY-	November	\$7,558	2400 East	Ventura	ICAH7205
ONE	22, 2021		Ponderosa		
			Drive,		
			Camarillo,		
			California		
TWENTY-	January	\$1,900	2400 East	Ventura	ICAH7205
TWO	31, 2022		Ponderosa		
			Drive,		
			Camarillo,		
			California		
TWENTY-	November	\$5,800	1102 Higuera	San Luis	ICAH6640
THREE	23, 2021,		Street, San	Obispo	
			Luis Obispo,		
			California		

COUNTS TWENTY-FOUR THROUGH TWENTY-SEVEN

[18 U.S.C. § 2113(b)]

On or about the following dates, in Ventura County, within the Central District of California, defendant GENE CLARK VIZCONDE CONTRERAS knowingly took and carried away, with the intent to steal and purloin, money and things of value exceeding \$1,000, namely, cash in the following amounts, belonging to, and in the care, custody, control, management, and possession of JPMorgan Chase Bank, N.A., a bank the deposits of which were then insured by the Federal Deposit Insurance Corporation:

COUNT	DATE(S)	APPROXIMATE AMOUNT	LOCATION	COUNTY	ATM ID. NO.
TWENTY- FOUR	January 6, 2022	\$5,400	2181 North Rose Avenue,	Ventura	CA4351
			Oxnard, California		
TWENTY- FIVE	February 6, 2022	\$4,500	2181 North Rose Avenue,	Ventura	CA4351
			Oxnard, California		
TWENTY- SIX	January 11, 2022	\$2,460	539 W. Harvard Boulevard, Santa Paula, California	Ventura	CA0821
TWENTY- SEVEN	January 28, 2022	\$6,560	310 S. Wells Road, Ventura, California	Ventura	CA9111

COUNTS TWENTY-EIGHT THROUGH FIFTY-EIGHT

[18 U.S.C. § 2113(b)]

On an unknown date within the following periods, in the following counties, within the Central District of California, defendant GENE CLARK VIZCONDE CONTRERAS knowingly took and carried away, with the intent to steal and purloin, money and things of value belonging to, and in the care, custody, control, management, and possession of Bank of America, N.A., a bank the deposits of which were then insured by the Federal Deposit Insurance Corporation:

COUNT	DATE (S)	LOCATION	COUNTY	ATM ID. NO.
TWENTY- EIGHT	February 18, 2022 through February 22, 2022	1096 Coast Village Road, Santa Barbara, California	Santa Barbara	ICAH3787
TWENTY- NINE	August 5, 2021 through September 3, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH3219
THIRTY	September 3, 2021 through September 29, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH3219
THIRTY- ONE	October 12, 2021 through October 29, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH3219
THIRTY- TWO	November 9, 2021 through December 7, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH3219
THIRTY- THREE	December 13, 2021 through December 29, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH3219
THIRTY- FOUR	February 8, 2022 through February 11, 2022	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH3219

COUNT	DATE (S)	LOCATION	COUNTY	ATM ID. NO.
THIRTY- FIVE	October 11, 2021 through October 26, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH4323
THIRTY- SIX	October 26, 2021 through November 18, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH4323
THIRTY- SEVEN	November 18, 2021 through December 7, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH4323
THIRTY- EIGHT	December 13, 2021 through January 15, 2022	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH4323
THIRTY- NINE	February 4, 2022 through February 7, 2022	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH4323
FORTY	September 17, 2021 through October 25, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH5914
FORTY-ONE	November 26, 2021 through December 6, 2021	1855 North Oxnard Boulevard, Oxnard, California	Ventura	ICAH5914
FORTY-TWO	January 13, 2022 through February 18, 2022	755 West Channel Islands Boulevard, Port Hueneme, California	Ventura	ICAH1078
FORTY- THREE	October 19, 2021 through December 6, 2021	755 West Channel Islands Boulevard, Port Hueneme, California	Ventura	ICAH7782
FORTY- FOUR	December 30, 2021 through January 4, 2022	755 West Channel Islands Boulevard, Port Hueneme, California	Ventura	ICAH7782

COUNT	DATE (S)	LOCATION	COUNTY	ATM ID. NO.
FORTY- FIVE	January 7, 2022 through January 13, 2022	755 West Channel Islands Boulevard, Port Hueneme, California	Ventura	ICAH7782
FORTY-SIX	February 9, 2022	755 West Channel Islands Boulevard, Port Hueneme, California	Ventura	ICAH7782
FORTY- SEVEN	July 13, 2021 through August 26, 2021	755 West Channel Islands Boulevard, Port Hueneme, California	Ventura	ICAH1051
FORTY- EIGHT	September 13, 2021 through October 12, 2021	205 West Ojai Avenue, Ojai, California	Ventura	ICAH2867
FORTY- NINE	February 15, 2022	205 West Ojai Avenue, Ojai, California	Ventura	ICAH2867
FIFTY	August 24, 2021 through August 30, 2021	205 West Ojai Avenue, Ojai, California	Ventura	ICAH5926
FIFTY-ONE	January 4, 2022	205 West Ojai Avenue, Ojai, California	Ventura	ICAH5926
FIFTY-TWO	September 15, 2021 through November 2, 2021	2400 East Ponderosa Drive, Camarillo, California	Ventura	ICAH2761
FIFTY- THREE	January 12, 2022 through February 23, 2022	2400 East Ponderosa Drive, Camarillo, California	Ventura	ICAH2761
FIFTY- FOUR	August 14, 2021 through October 9, 2021	2400 East Ponderosa Drive, Camarillo, California	Ventura	ICAH6825
FIFTY- FIVE	October 9, 2021 through November 17, 2021	2400 East Ponderosa Drive, Camarillo, California	Ventura	ICAH6825

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COUNT	DATE (S)	LOCATION	COUNTY	ATM ID. NO.
FIFTY-SIX	January 3, 2022 through February 14, 2022	2400 East Ponderosa Drive, Camarillo, California	Ventura	ICAH6825
FIFTY- SEVEN	July 12, 2021 through September 17, 2021	2400 East Ponderosa Drive, Camarillo, California	Ventura	ICAH7205
FIFTY- EIGHT	December 11, 2021 through January 14, 2022	2400 East Ponderosa Drive, Camarillo, California	Ventura	ICAH7205

COUNTS FIFTY-NINE AND SIXTY

[18 U.S.C. § 2113(b)]

On an unknown date within the following periods, in Ventura
County, within the Central District of California, defendant GENE
CLARK VIZCONDE CONTRERAS knowingly took and carried away, with the
intent to steal and purloin, money and things of value belonging to,
and in the care, custody, control, management, and possession of
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1 JPMorgan Chase Bank, N.A., a bank the deposits of which were then 2 insured by the Federal Deposit Insurance Corporation:

COUNT	DATE (S)	LOCATION	COUNTY	ATM ID. NO.
FIFTY- NINE	December 26, 2021 through December 29, 2021	2181 North Rose Avenue, Oxnard, California	Ventura	CA4351
SIXTY	December 31, 2021 through January 1, 2022	2181 North Rose Avenue, Oxnard, California	Ventura	CA4351

A TRUE BILL

/s/

Foreperson

E. MARTIN ESTRADA United States Attorney

MACK E. JENKINS Assistant United States Attorney Chief, Criminal Division



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SCOTT M. GARRINGER Assistant United States Attorney Deputy Chief, Criminal Division

JOSHUA O. MAUSNER Assistant United States Attorney Deputy Chief, General Crimes Section

LYNDSI ALLSOP Assistant United States Attorney Violent & Organized Crime Section